

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF ALABAMA**

IN RE:

LATOYA D WASHINGTON

Case No. 19-30797-WRS  
Chapter 13

Debtor(s)

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**PURSUANT TO LOCAL RULE 1017-1, THIS CASE MAY BE DISMISSED WITHOUT FURTHER NOTICE OR HEARING UNLESS A RESPONSE IS FILED BY A PARTY IN INTEREST WITHIN 21 DAYS OF THE DATE OF SERVICE. RESPONSES MUST BE SERVED UPON THE MOVING PARTY AND, IN THE MANNER DIRECTED BY LOCAL RULE 5005-1, FILED WITH THE CLERK ELECTRONICALLY OR BY U.S. MAIL ADDRESSED AS FOLLOWS: CLERK, U.S. BANKRUPTCY COURT, ONE CHURCH STREET, MONTGOMERY, AL 36104.**

This pleading is being filed and noticed pursuant to M.D. Ala., LBR 9007-1 procedures for the following:  
Dismissal LBR Rule 1017-1

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**TRUSTEE'S MOTION TO DISMISS FOR EXTENDED DEFAULT**

COMES NOW, Sabrina L. McKinney, Chapter 13 Trustee for this district, and moves the Court to dismiss the above entitled case pursuant to 11 U.S.C., §1307 (and LBR 1017-1), in that the debtor's actions have caused unreasonable delay that is prejudicial to creditors. As grounds for said motion, the Trustee states as follows:

The debtor filed a petition seeking relief under Chapter 13 of the United States Bankruptcy Code on March 22, 2019.

The debtor has failed to make payments to the Trustee pursuant to the terms of the debtor's Chapter 13 plan.

The debtor's payments to the Trustee are being paid as the following:

DEBTOR NAME	AMOUNT	FREQUENCY	START DATE
LATOYA D WASHINGTON	185.00	WEEKLY	04/21/2019
LATOYA D WASHINGTON	185.00	WEEKLY	10/23/2019

The following is a list of all payments made to the Trustee within the last 180 days:

The overall pay record with the Trustee is 43.10% and the debtor's total plan delinquency is \$6,105.00.

WHEREFORE, the above premises considered, the Trustee moves this Honorable Court for an Order dismissing the debtor's case and for any such other relief to which the Trustee may be entitled.

Respectfully submitted this, 5/27/2020.

Sabrina L. McKinney  
Chapter 13 Standing Trustee

*/s/ Sabrina L. McKinney*

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Sabrina L. McKinney  
Chapter 13 Standing Trustee

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#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Motion to Dismiss on the debtor's and the debtor's attorney, by placing them in the United States Mail, postage prepaid, and properly addressed, or by electronic mail.

Done, this May 27, 2020.

*/s/ Sabrina L. McKinney*

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Sabrina L. McKinney  
Chapter 13 Standing Trustee